Case 4:22-cr-00275-P Document 43 Filed 11/09/22

ORIGINAL

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS

FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:22-CR-275-P

MORTHERN DISTRICT OF TEXT

MOA - 7 5055

CLERK, U.S. DISTRICT COUL

LATOYAL LANELL BRYANT (02)

FACTUAL RESUME

INFORMATION:

Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. § 841(a)(1) and (b)(1)(C))

<u>PENALTY</u>: \$1,000,000 fine - not more than 20 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 3 years.

MAXIMUM PENALTY:

\$1,000,000 fine and not more than twenty (20) years imprisonment, plus a term of supervised release of not less than 3 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Information are as follows:

First:

That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the information;

Second:

That the defendant knew of the unlawful purpose of the agreement;

Third:

That the defendant joined in the agreement willfully, that is, with the intent

to further its unlawful purpose;

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Fourth:

That the overall scope of the conspiracy involved a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

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In and around August 2022, Latoyal Lanell Bryant allowed others, such as Myron Lynn Matthews, Jr., to conduct methamphetamine-transactions at her residence, xxx S. Jennings, Apt. 2201, Fort Worth, Texas. In exchange, Latoyal Lanell Bryant received personal-use amounts of marijuana. Sometimes, Bryant would not be aware of the actual amounts of methamphetamine being bought and sold at her residence by Myron Lynn Matthews, Jr. And on August 24, 2022, HSI Agents/Officers executed a search warrant at Bryant's residence. Prior to its execution, Bryant removed methamphetamine and guns from her apartment and hid them at her mother's apartment. Later, Bryant admitted to moving and hiding the methamphetamine and drugs, and they were recovered by law enforcement. In this manner, Latoyal Lanell Bryant and Myron Lynn Matthews, Jr. conspired with each other and others to possess methamphetamine with intent to distribute it.

SIGNED this day of ^	sovember, 2022.
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LATOYAL LANELL BRYANT	BENSON VARGHESE
Defendant	Counsel for Defendant